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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiff,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF AARON CERA IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF PLAINTIFFS'  
MOTION FOR RELIEF FROM  
NONDISPOSITIVE PRETRIAL ORDER OF  
MAGISTRATE JUDGE**

I, Aaron Cera, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am an associate of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Richard Kadrey, Sarah Silverman and Christopher Golden (“Plaintiffs”) in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to File Under Seal Portions of Plaintiffs’ Motion for Relief From Nondispositive Pretrial Order Of Magistrate Judge (“Motion”).

2. Plaintiffs have reviewed and complied with the Standing Order Motions to Seal before District Judge Vince Chhabria.

3. Plaintiffs have reviewed and complied with Civil Local Rule 79-5.

4. Plaintiffs have filed conditionally under seal portions of the Motion that contain or reference material and information that Meta contends is subject to the attorney-client privilege and protected under the Court’s Order of August 22, 2024 (ECF 114).

5. The following chart sets forth details regarding the information Plaintiffs seek to file under seal:

Redacted Portion	Description of Information	Reason for Sealing
<b>Bottom Pg. 1-Top Pg. 2</b>	Information Meta contends is protected by the attorney-client privilege.	Meta contends is subject to the attorney-client privilege and protected under the Court’s Order of August 22, 2024 (ECF 114)
<b>Bottom Pg. 2</b>	Information Meta contends is protected by the attorney-client privilege.	Meta contends is subject to the attorney-client privilege and protected under the Court’s Order of August 22, 2024 (ECF 114)
<b>Bottom Pg. 2</b>	Information Meta contends is protected by the attorney-client privilege.	Meta contends is subject to the attorney-client privilege and protected under the Court’s Order of August 22, 2024 (ECF 114)

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5<sup>th</sup> day of September 2024 in San Francisco, California.

Dated: September 5, 2024

By: /s/ Aaron Cera  
Aaron Cera

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: September 5, 2024

/s/ Joseph R. Saveri  
Joseph R. Saveri